IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application of: Charles Gordon FISHER, III Confirmation No.: 4435

Application No.: 10/054,192 Group Art Unit: 3609

Filed: January 22, 2002 Examiner: Richard M. Ross.

For: SYSTEM FOR AND METHOD OF

INDIVIDUAL ANNUITY PAYOUT

ADMINISTRATION

RESPONSE TO OFFICE ACTION

Attorney Docket No.: 84417-4002

Mail Stop Amendment

Commissioner for Patents P.O. Box 1450 Alexandria VA 22313-1450

Sir:

In response to the Office Action mailed on May 31, 2007, please enter the following comments into the file of this application.

Amendments to the Claims are reflected in the complete listing of all claims which begins on page 2 of this paper.

Remarks begin on page 4 of this paper.

No fee is believed to be due for this Amendment. Should any fee be required, however, please charge such fee to Winston & Strawn LLP Deposit Account No. 50-1814.